

ID. Date of interview  
date 27/01/20

ID. Time interview started  
start 12:22:23

ID.end Completion date of interview  
Date 27/01/20

ID.end Time interview ended  
13:18:04

ID. Duration of interview  
time 55.68

## Start of new case

Q1 Does the draft guidance cover the relevant issues about the right of access?

Yes

No

Unsure / don't know

If no or unsure/don't know, what other issues would you like to be covered in it?

Q2 Does the draft guidance contain the right level of detail?

Yes

No

Unsure / don't know

If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?

Yes

No

Unsure / don't know

If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

Further "real life" examples regarding exemptions would be helpful

Q4 We have found that data protection professionals often struggle with applying and defining 'manifestly unfounded or excessive' subject access requests. We would like to include a wide range of examples from a variety of sectors to help you. Please provide some examples of manifestly unfounded and excessive requests below (if applicable).

Q5 On a scale of 1-5 how useful is the draft guidance?

|                       |                       |                       |                                  |                       |
|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|
| 1 - Not at all useful | 2 – Slightly useful   | 3 – Moderately useful | 4 – Very useful                  | 5 – Extremely useful  |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

Q6 Why have you given this score?

We found the structure and the advice on how to think about issues to be very clear

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?

|                       |                       |                            |                                  |                       |
|-----------------------|-----------------------|----------------------------|----------------------------------|-----------------------|
| Strongly disagree     | Disagree              | Neither agree nor disagree | Agree                            | Strongly agree        |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/>      | <input checked="" type="radio"/> | <input type="radio"/> |

Q8 Please provide any further comments or suggestions you may have about the draft guidance.

We continue to be concerned about the section regarding deleted emails. "For the avoidance of doubt, you should not regard the contents of an email as deleted merely because it has been moved to a user's 'Deleted items' folder." We consider that most individuals who have deleted an email to have reasonably thought it to be deleted and would be surprised that they need to process it further to remove beyond the scope of searches. You will be aware for example that even emails deleted from a users "Deleted items" in MS office live through further stages of recoverability prior to being purged. We are also concerned about the advice on the continued running of the clock when clarifying information from the data subject. We consider that on large and complex requests this may lead to considerable nugatory work being undertaken particularly when this relates to specifying and conducting email searches and the subsequent manual review and processing of search outputs. In our experience clarification assists greatly in developing more focused search specifications which subsequently reduce the volume of out of scope (and third party) material to be sifted.

Q9 Are you answering as:

- An individual acting in a private capacity (eg someone providing their views as a member of the public)
- An individual acting in a professional capacity
- On behalf of an organisation
- Other

Please specify the name of your organisation:

Goldsmiths University

What sector are you from:

Higher education

Q10 How did you find out about this survey?

- ICO Twitter account
- ICO Facebook account
- ICO LinkedIn account
- ICO website
- ICO newsletter
- ICO staff member
- Colleague
- Personal/work Twitter account
- Personal/work Facebook account
- Personal/work LinkedIn account
- Other

If other please specify: